Given the service providers' differing network and traffic characteristics, some service providers may find RTP's ability to accommodate alternative trigger mechanisms to be technologically and economically more efficient for the provision of number portability service. Additionally, unlike LRN which queries or processes all calls to ported and non-ported numbers, RTP triggers or processes calls only to ported telephone numbers. Calls to non-ported numbers require no additional processing and are routed as usual without any additional set-up time or cost.

1. RTP is Technologically More Efficient Than LRN

To date, no evidence has been presented in this proceeding addressing the proportion of California telephone subscribers willing to change service providers while retaining their existing telephone numbers if and when long-term number portability becomes effective. DRA finds it unreasonable to mandate now a single LNP solution in California which requires the processing of all calls, regardless of whether such calls terminate at ported or non-ported telephone numbers. Such unnecessary processing will not only result in additional investment and operational costs to the service providers, but could also result in increased telephone bills to all customers regardless of whether such customers subscribe to number portability service or not.

Therefore, from a technological standpoint, DRA believes RTP offers the best LNP solution in California at this time. It is flexible, easily expandable and technologically nondiscriminatory. It would allow service providers to employ trigger mechanisms most suitable and cost-effective for their respective networks and customer calling patterns. Additionally, RTP's expandability and flexibility will accommodate the application of future LNP technological innovations with minimum network investments.

2. RTP is Economically More Efficient Than LRN

From an economic perspective, DRA also believes RTP presents the most cost-effective LNP solution for California's ratepayers. Evidence in this proceeding has shown that today, Pacific Bell (Pacific), GTE California (GTEC) and Contel of California (Contel)[2] provide local exchange services to over 95% of California telephone subscribers. The implementation cost estimates[3] provided by these three California local exchange carriers (LECs) for each of the proposed LNP solutions demonstrate RTP is the most economical and cost-effective LNP solution for California telephone ratepayers at this time.

The reasons for RTP's economic qualities are clear. First, the LNP database or customer information is located in the service provider's existing network. This obviates additional and costly network reconfigurations and investments. Second, RTP is less costly to implement and less difficult to administer since number portability service is provided over the incumbents' existing telephone network infrastructure. Third, RTP eliminates the need to query or trigger every interswitch call. Only calls to ported customers are processed. All other calls to non-ported customers will be routed as they are today. This enhances efficiency, reliability, and lower operating costs.

3. The RTP Solution Provides Better Long-Term Benefits to California Consumers.

DRA supports the Commission's intent to expeditiously implement LNP in California. However, some parties, as indicated in Attachment 8 of this report, assert that RTP technology may

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2. GTEC and Contel both support Pacific's proposed RTP technology for number portability. (Report, p. 50).
3. Pacific estimates (in 1997 dollars) an initial cost of $148 million and an annual recurring cost of $26 million to implement LRN. Conversely, Pacific estimates an initial cost $102 million and an annual recurring cost of $19 million to implement RTP. GTEC on the other hand estimates total cost of $88 million to implement RTP and a total cost of $87 million to implement LRN for its California operations. (Attachment 3 of Report),

not be available until 3 to 6 months after LRN technology is available and that this could cause delay in the implementation of LNP in California, if RTP is adopted. DRA shares this concern. However, given the superior technical and economic qualities of RTP, a delay of 3 to 6 months in LNP implementation is not unreasonable. DRA believes that the long-term benefits of RTP to California consumers outweigh the potential consequences of a 3 to 6 month delay in the implementation of LNP in California.

III. CONCLUSION

In conclusion, DRA believes RTP balances the technical, economic, efficiency, reliability, and implementation considerations required in an LNP technology in California. RTP, while using a local routing algorithm common to all service providers, further accommodates alternative trigger mechanisms more suitable and cost-effective to the service provider's network. DRA believes restricting service providers to a particular trigger mechanism, such as the SS7 database in LRN, is not appropriate and could inconvenience consumers, and could cause unnecessary expenses to service providers and their customers. Therefore, DRA urges the Commission to adopt RTP as the appropriate LNP solution in California.

Respectfully submitted,

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March 15, 1996

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document entitled **"COMMENTS OF THE DIVISION OF RATEPAYER ADVOCATES ON THE CALIFORNIA LOCAL NUMBER PORTABILITY TASK FORCE REPORT TO THE COMMISSION"** upon all known parties of record in this proceeding, by mailing by first-class a copy thereof properly addressed to each party.

Dated at San Francisco, California, this 15th day of March 1996.

/s/ RENITA STONE

Renita Stone